

EXHIBIT PP

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Connectu LLC, Cameron Winklevoss,
Tyler Winklevoss, Howard Winklevoss,
and Divya Narendra

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v,

CONNECTU LLC, CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, HOWARD
WINKLEVOSS, DIVYA NARENDRA, AND
DOES 1-25.

Defendants.

CASE NO. 105 CV 047381

**RESPONSE OF DEFENDANT TYLER
WINKLEVOSS TO FORM
INTERROGATORIES**

1 **PROPOUNDING PARTY:** Plaintiff THEFACEBOOK, INC.

2 **RESPONDING PARTY:** Defendant TYLER WINKLEVOSS

3 **SET NO.:** ONE (1)

4 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

5 The above-named party hereby responds, pursuant to California Code of Civil Procedure
6 Section 2030, to the form interrogatories as follows:

7 **PREFATORY STATEMENT**

8 It should be noted that this responding party has not fully completed its investigation of the
9 facts relating to this case, has not completed discovery, and has not completed its preparation for
10 trial.

11 All of the responses contained herein are based only upon such information and documents
12 as are presently available to and specifically known to this responding party and disclose only those
13 contentions which presently occur to such responding party.

14 It is anticipated that further discovery, independent investigation, legal research, and analysis
15 will supply additional facts and add meaning to known facts, as well as establish entirely new factual
16 conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and
17 variations from the contentions herein set forth.

18 The following responses are given without prejudice to responding party's right to produce
19 evidence of any subsequently discovered fact or facts which this responding party may later recall.
20 Responding party accordingly reserves the right to change any and all answers herein as additional
21 facts are ascertained, analyses are made, legal research is completed, and contentions are made. The
22 responses contained herein are made in a good faith effort to supply as much factual information and
23 as much specification of legal contentions as are presently known, but should in no way be to the
24 prejudice of this responding party in relation to further discovery, research, or analysis.

25 **RESPONSE TO FORM INTERROGATORIES**

26 **Response to 1.1**

27 I was the only person who prepared the responses to these interrogatories.

1 **Response to 2.1**

2 Tyler Winklevoss

3 **Response to 2.2**

4 Southampton, NY

5 **Response to 2.3**

6 Not applicable as there was no "unauthorized access of the Facebook's data."

7 **Response to 2.4**

8 Not applicable as there was no "unauthorized access of the Facebook's data."

9 **Response to 2.5**

10 (a) 100 Landsdowne Street, Apt. 1405
11 Cambridge, MA 02139

12 and/or

13 10 Khakum Wood Road
14 Greenwich, CT 06831

15 (b) and (c)

16 In or about 2003 through in or about 2005: 8 Museum Way, Apt. 2406
17 Cambridge, MA 02141
18 2002 - 2004

19 or

20 Pforzheimer House
21 56 Linnean Street
22 Cambridge, MA 02141

23 or

24 10 Khakum Wood Road
25 Greenwich, CT 06831

26 In or about 2001 through in or about 2003: Pforzheimer House
27 56 Linnean Street
28 Cambridge, MA 02138

27 **Response to 2.6**

28 Not applicable as there was no "unauthorized access of the Facebook's data."

1 **Response to 2.7**

2 1996-2000: High School Diploma Brunswick School 100 Maher Avenue Greenwich, CT.
3 2000-2004: B.A. Economics Harvard University Cambridge, MA 02138

4 **Response to 2.8**

5 No

6 **Response to 2.11**

7 Not applicable as there was no "unauthorized access of the Facebook's data."

8 **Response to 2.12**

9 Not applicable as there was no "unauthorized access of the Facebook's data."

10 **Response to 3.1**

11 No

12 **Response to 3.2**

13 No

14 **Response to 3.3**

15 No

16 **Response to 3.4**

17 No

18 **Response to 3.5**

19 No

20 **Response to 3.6**

21 No

22 **Response to 3.7**

23 No

24 **Response to 4.1**

25 Not applicable as there was no "unauthorized access of the Facebook's data."

26 **Response to 4.2**

27 Not applicable as there was no "unauthorized access of the Facebook's data."

1 **Response to 8.2**

2 Not applicable as there was no "unauthorized access of the Facebook's data."

3 **Response to 8.3**

4 Not applicable as there was no "unauthorized access of the Facebook's data."

5 **Response to 8.4**

6 Not applicable as there was no "unauthorized access of the Facebook's data."

7 **Response to 11.1**

8 Not applicable as there was no "unauthorized access of the Facebook's data."

9 **Response to 12.1**

10 Not applicable as there was no "unauthorized access of the Facebook's data."

11 **Response to 12.2**

12 Not applicable as there was no "unauthorized access of the Facebook's data."

13 **Response to 12.3**

14 Not applicable as there was no "unauthorized access of the Facebook's data."

15 **Response to 12.4**

16 Not applicable as there was no "unauthorized access of the Facebook's data."

17 **Response to 12.5**

18 Not applicable as there was no "unauthorized access of the Facebook's data."

19 **Response to 12.6**

20 Not applicable as there was no "unauthorized access of the Facebook's data."

21 **Response to 12.7**

22 Not applicable as there was no "unauthorized access of the Facebook's data."

23 **Response to 13.1**

24 Not applicable as there was no "unauthorized access of the Facebook's data."

25 **Response to 13.2**

26 Not applicable as there was no "unauthorized access of the Facebook's data."

27 **Response to 15.1**

28 No applicable. A demurrer and a motion to quash was filed.

1 **Response to 16.1**

2 Not applicable as there was no "unauthorized access of the Facebook's data." See
3 ConnectU's demurrer, filed on October 25, 2005.

4 **Response to 16.2**

5 Not applicable as there was no "unauthorized access of the Facebook's data." See
6 ConnectU's demurrer, filed on October 25, 2005.

7 **Response to 16.3**

8 Not applicable as there was no "unauthorized access of the Facebook's data."

9 **Response to 16.6**

10 Not applicable as there was no "unauthorized access of the Facebook's data."

11 **Response to 16.7**

12 Not applicable as there was no "unauthorized access of the Facebook's data."

13 **Response to 16.8**

14 Responding party does not understand Plaintiff is claiming property damage.

15 **Response to 16.9**

16 Not applicable as there was no "unauthorized access of the Facebook's data."

17 **Response to 17.1**

18 Regarding Request No. 1, Responding Party states he does not have a FACEBOOK
19 individual member ID.

20 Regarding Request No. 2, Responding Party visited FACEBOOK's website only in his
21 capacity as a member of ConnectU. See ConnectU's Response to Request No. 2 and its Response to
22 Interrogatory No. 17.1 as it concerns Request For Admissions, No. 2.

23 Regarding Request No. 3, Responding Party visited FACEBOOK's website only in his
24 capacity as a member of ConnectU. See ConnectU's Response to Request No. 3 and its Response to
25 Interrogatory No. 17.1 as it concerns Request For Admissions, No. 3.

26 Regarding Request No. 4, Responding Party visited FACEBOOK's website only in his
27 capacity as a member of ConnectU. See ConnectU's Response to Request No. 4.

28 Regarding Request No. 5, Responding Party visited FACEBOOK's website only in his
capacity as a member of ConnectU. See ConnectU's Response to Request No. 5.

Regarding Request No. 6, Responding Party visited FACEBOOK's website only in his
capacity as a member of ConnectU. See ConnectU's Response to Request No. 6 and its Response to
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 6.

1 Regarding Request No. 7, Responding Party visited FACEBOOK's website only in his
2 capacity as a member of ConnectU. See ConnectU's Response to Request No. 7.

3 Regarding Request No. 8, Responding Party activities regarding FACEBOOK's website
4 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
5 8 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 8.

6 Regarding Request No. 9, Responding Party activities regarding FACEBOOK's website
7 were done only in his capacity as a member of ConnectU.. See ConnectU's Response to Request
8 No. 9 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 9.

9 Regarding Request No. 10, Responding Party activities regarding FACEBOOK's website
10 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
11 10 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 10.

12 Regarding Request No. 11, Responding Party activities regarding FACEBOOK's website
13 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
14 11 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 11.

15 Regarding Request No. 12, Responding Party activities regarding FACEBOOK's website
16 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
17 12 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 12.

18 Regarding Request No. 13, Responding Party activities regarding FACEBOOK's website
19 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
20 13 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 13.

21 Regarding Request No. 14, Responding Party activities regarding FACEBOOK's website
22 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
23 14 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 14.

24 Regarding Request No. 15, Responding Party visited FACEBOOK's website only in his
25 capacity as a member of ConnectU. See ConnectU's Response to Request No. 15 and its Response
26 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 15.

27 Regarding Request No. 16, Responding Party visited FACEBOOK's website only in his
28 capacity as a member of ConnectU. See ConnectU's Response to Request No. 16.

29 Regarding Request No. 17, Responding Party visited FACEBOOK's website only in his
30 capacity as a member of ConnectU. See ConnectU's Response to Request No. 17 and its Response
31 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 17.

32 Regarding Request No. 18, Responding Party visited FACEBOOK's website only in his
33 capacity as a member of ConnectU. See ConnectU's Response to Request No. 18 and its Response
34 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 18.

35 Regarding Request No. 19, Responding Party visited FACEBOOK's website only in his
36 capacity as a member of ConnectU. See ConnectU's Response to Request No. 19 and its Response
37 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 19.

38 Regarding Request No. 20, Responding Party visited FACEBOOK's website only in his
39 capacity as a member of ConnectU. See ConnectU's Response to Request No. 20 and its Response
40 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 20.

1 Regarding Request No. 21, Responding Party visited FACEBOOK's website only in his
2 capacity as a member of ConnectU. See ConnectU's Response to Request No. 21 and its Response
2 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 21.

3 Regarding Request No. 22, Responding Party activities regarding FACEBOOK's website
4 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
4 22.

5 Regarding Request No. 23, Responding Party activities regarding FACEBOOK's website
6 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
6 23 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 23.

7 Regarding Request No. 24, Responding Party activities regarding FACEBOOK's website
8 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
8 24 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 24.

9 Regarding Request No. 25, Responding Party activities regarding FACEBOOK's website
10 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
10 25 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 25.

11
12 **Response to 50.3**

13 Responding party does not understand that there is an agreement alleged in the Plaintiff's
14 complaint.

15
16 **Response to 50.4**

17 Responding party does not understand that there is an agreement alleged in the Plaintiff's
18 complaint.

19
20 **Response to 50.5**

21 Responding party does not understand that there is an agreement alleged in the Plaintiff's
22 complaint.

23
24 **Response to 50.6**

25 Responding party does not understand that there is an agreement alleged in the Plaintiff's
26 complaint.

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TYLER WINKLEVOSS, under penalty of perjury under the laws of the State of California,
states as follows:

1. That he is one of the Defendants in the above-entitled action;
2. That he has read the foregoing RESPONSE OF TYLER WINKLEVOSS TO FORM
INTERROGATORIES and knows the contents thereof, and that the same is true of his own
knowledge, save and except as to the matters which are therein stated on his information or belief,
and as to those matters, he believes it to be true.

Executed on the 30 day of October, 2005, at 7:25 PM.

After Winklevoss
Tyler Winklevoss